

REMARKS

This is intended as a full and complete response to the Office Action dated October 20, 2005, having a shortened statutory period for response extended one-month set to expire on February 20, 2006.

Claims 1-22, 24, and 43-49 remain pending in the application after entry of this response. Claims 23 and 40-42 have been cancelled, and claims 43-49 have been added. Reconsideration of the rejected claims is requested for reasons presented herein.

§ 102

Claims 1-7, 14 and 16-17 stand rejected under 35 USC § 102(b) as being anticipated by *D'Audiffret*, U.S. Patent No. 2,933,137.

D'Audiffret discloses a plastic well screen. *D'Audiffret* does not teach, show, or suggest an edge portion of the at least one opening is hardened by a quenching process, as recited in claims 1 and 16. Withdrawal of the rejection is respectfully requested.

Claims 1-5, 8, 14, 18, 20 and 24 stand rejected under 35 USC § 102(b) as being anticipated by *Gryskiewicz*, U.S. Patent No. 4,343,358.

Gryskiewicz discloses a plastic well screen having tapered, undercut slots. *Gryskiewicz* does not teach, show, or suggest an edge portion of the at least one opening is hardened by a quenching process, as recited in claim 1. Also, *Gryskiewicz* does not teach, show, or suggest an outer edge portion of the perforation has been quenched, as recited in claim 18. Withdrawal of the rejection is respectfully requested.

Claims 15, 18-20 and 22-23 stand rejected under 35 USC § 102(b) as being anticipated by *Chupka*, U.S. Patent No. 4,901,417.

Chupka discloses a screen plate for pressure screening of papermaking stock. Openings in the plate are formed by laser cutting or machining. The walls are

momentarily heated by the laser to a molten state. (Col. 7, Ins. 21-25). As the laser beam passes, the wall layer 40 rapidly cools due to the mass of the plate and the thinness of the layer which has been molten. (Col. 7, Ins. 26-28). *Chupka* does not teach, show, or suggest a quenched edge portion. Therefore, *Chupka* does not teach, show, or suggest an edge portion of the at least one opening is hardened by a quenching process, as recited in claims 1, 15, and 16. Also, *Chupka* does not teach, show, or suggest an outer edge portion of the perforation has been quenched, as recited in claim 18. Further, *Chupka* does not teach, show, or suggest quenching an edge portion of the opening, as recited in claim 46. Withdrawal of the rejection is respectfully requested.

Claims 18-21 stand rejected under 35 USC § 102(b) as being anticipated by EP1152120 to *Castano-Mears*.

Castano-Mears discloses an expandable well screen having a base pipe and a filtering media. *Castano-Mears* does not teach, show, or suggest an outer edge portion of the perforation has been quenched, as recited in claim 18. Withdrawal of the rejection is respectfully requested.

§ 103

Claims 1 and 9 stand rejected under 35 USC § 103(a) as being anticipated over *Nuzman*, U.S. Patent No. 4,133,379 in view of *Gryskiewicz*.

As discussed above, *Gryskiewicz* discloses a plastic well screen having tapered, undercut slots. *Nuzman* discloses a foraminous screening device having a plurality of spaced apart apertures. The references, neither alone nor in combination, teach, show, or suggest an edge portion of the at least one opening is hardened by a quenching process, as recited in claims 1. Withdrawal of the rejection is respectfully requested.

Claims 1 and 11-13 stand rejected under 35 USC § 103(a) as being unpatentable over *Castano-Mears* in view of *Gryskiewicz*.

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As discussed above, the references do not teach, show, or suggest an edge portion of the at least one opening is hardened by a quenching process, as recited in claims 1. Withdrawal of the rejection is respectfully requested.

Claim 10 stands rejected under 35 USC § 103(a) as being unpatentable over *Gryskiewicz* in view of *Chupka*.

As discussed above, Applicant believes claim 1 is in condition for allowance. Claim 1 depends from claim 10. Therefore, Applicant also believes claim 10 is in condition for allowance. Withdrawal of the rejection is respectfully requested.

Claims 40-42 stand rejected under 35 USC § 103(a) as being unpatentable over *Donnelly*, U.S. Patent No. 6,315,040 in view of *Gryskiewicz*.


Claims 40-42 have been cancelled.

Conclusion

In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed.

Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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